



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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January 6, 2006

Andrew J. Newman
Rubin and Rudman LLP
50 Rowes Wharf
Boston, MA 02110-3319

Re: Blackstone Gas Company, D.T.E. 05-50

Dear Mr. Newman:

Enclosed please find the Department of Telecommunications and Energy's First Set of Information Requests to Blackstone Gas Company issued in the above-captioned matter. Responses are due on or before January 17, 2006. Thank you for your attention in this matter.

Sincerely,

John J. Geary
Hearing Officer

Enc.

cc: Mary L. Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO BLACKSTONE GAS COMPANY**

D.T.E. 05-50

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy (“Department”) submits to Blackstone Gas Company (“Blackstone” or “Company”), the following information requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) John J. Geary, Hearing Officer; (2) Elizabeth Jackson, Natural Gas Division; (3) Cynthia Bradbury, Natural Gas Division; and (4) Andreas Thanos, Assistant Director Natural Gas Division.
8. Responses are due by 5 p.m., January 17, 2006.

INFORMATION REQUESTS

- DTE 1-1 Refer to the Plan at 4. Please give a detailed explanation of how the Company arrived at the monthly base use for its customers.
- DTE 1-2 Please confirm that the National Weather Service owns, operates, and maintains the West Medway weather reporting station. Also explain whether the weather reporting station is permanently staffed by weather personnel, or if the station is automated. In addition, please discuss if there have been any problems associated with either the mechanical equipment at the station or actual measurement data.
- DTE 1-3 Refer to the Company's filing at 7. Explain what was deficient about Blackstone's external demographic equation and the data used in the equation applied in Blackstone Gas Company, D.T.E. 03-73 (2004). As part of this response, explain in detail why the Company chose not to use external demographic data and its accompanying equation in this filing. Include all supporting data and assumptions in the Company's response.
- DTE 1-4 Refer to the Company's filing at 7. Explain in detail why the Company's equation using internal data was "far superior" to Blackstone's external demographic data equation.
- DTE 1-5 Refer to Blackstone's filing at 6 ("Forecast Methodology"). Please explain in detail (with all supporting data and assumptions) the basis for the Company's assertion that, due to growth in sales and residential customers, the ". . . forecast presented in this filing is a combination of statistical analysis using available historical data and judgment based on discussions with the Company." Also explain (1) what factors and considerations comprise Blackstone's "judgment;" (2) how this "judgment" complements statistical analysis using historical data; (3) what were the substantive considerations at these discussions based on; and (4) who were the parties involved in these discussions?

- DTE 1-6 Please demonstrate how the Company's forecast provides a sound basis for resource planning decisions.
- DTE 1-7 Refer to Blackstone's filing at 7-8. Please explain in detail (with all supporting data and assumptions) why the models used in this filing reflect a lesser growth rate than that currently being experienced by the Company.
- DTE 1-8 Please describe the factors (with all supporting data and assumptions) that lead to the "significant growth" in customers as stated in the Company's filing at 7.
- DTE 1-9 Please summarize succinctly how Blackstone's filing accurately projects the gas sendout requirements of the Company's market area.
- DTE 1-10 Please summarize how Blackstone's filing ensures a necessary energy supply for its customers.
- DTE 1-11 Please refer to D.T.E. 03-73, at 2. Please demonstrate how the Company's long-range supply forecast is reviewable, appropriate, and reliable. Use all supporting data and assumptions in the Company's response.